

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**Case No. 13-20772
Hon. Gershwin Drain**

RASMIEH YUSEF ODEH,

Defendant.

**MOTION FOR DISCOVERY AND PRODUCTION IN SUPPORT OF
MOTION TO SUPPRESS**

NOW COMES, Rasmea Odeh, by her undersigned counsel and respectfully requests, pursuant to Federal Rules of Criminal Procedure 16 (a)(1)(E), that the Court order the government disclose the following information in its possession or otherwise available to it, necessary to present her motion to suppress any statements obtained by the Israeli authorities in 1969-70, which the government seeks to admit into evidence in the trial of the above-entitled cause;

1. The name, office and other identifying information of each person who interrogated Ms. Odeh after her arrest in 1969, including but not limited to the Israeli police, members of the Israeli military, and agents of the General security Service (GSS), also known as the Shin Bet or *Shaback*.

2. Further, that the government produce each interrogator of Ms. Odeh for a suppression hearing.
3. All written rules or protocols in force at that time which set out the procedures for interrogating “security” arrestees, and authorized methods for obtaining information from such persons, including when electro-shock was permitted, as well as physical/sexual abuse, threats and other forms of coercion.
4. All documents and writings concerning or touching upon the said interrogation of Rasmia Odeh.

These materials are necessary and appropriate in order for Ms. Odeh to have a full and fair suppression hearing.

Dated: March 15, 2017

Respectfully submitted,

“/s/” Michael E. Deutsch

MICHAEL E. DEUTSCH
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CERTIFICATE OF SERVICE

I herby certify that on March 15, 2017, I electronically filed or caused to be filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF filers.

/s/ Michael E. Deutsch
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1180 N. Milwaukee Ave.
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773-235-0070

Dated: March 15, 2017